

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-80068-CR-AMC

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YELYZAVETA DEMYDENKO

Defendant.

_____ /

DEMAND FOR ADDITIONAL DISCOVERY

COMES NOW, the Defendant, YELYZAVETA DEMYDENKO, by and through the undersigned attorney demands the disclosure of the following information and material for inspection, copying, testing, and photographing if within the Government's possession or control.

In the discovery provided by the Government, it is alleged that the defendant, Yelyzaveta Demydenko registered electronically to vote. The allegations include an assertion that the registration was done online on August 18, 2024.

Please provide copies of precise documentation supporting the allegation of online registration.

Further, please provide any and all forensic computer evidence to support this allegation including any IP address, IP address Tracking, MAC Address (Locally), Device Fingerprinting, Cookies and Tracking Scripts and/or Authentication Logs, and/or Network Logs.

Defense hereby demands disclosure of any and all such text messages.

Please provide the disclosures within fifteen days and the defendant upon the receipt of these disclosures, hereby agrees that the Defendant shall disclose, in any mutually agreeable manner, all corresponding information and material in the Defendant's possession or control, pursuant to Federal Rules of Criminal Procedure Rule 16(E)(i).

I HEREBY CERTIFY that on September 9, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

Respectfully submitted,

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BY: /s/ Christopher A. Haddad
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